

AC42469 : STATE OF CONNECTICUT
JUDITH KISSEL : APPELLATE COURT
V. :
CENTER FOR WOMEN’S HEALTH, P.C.,
ET AL. : NOVEMBER 1, 2019

PLAINTIFF-APPELLEE’S MOTION FOR EXTENSION OF TIME, ON CONSENT

Pursuant to Rule of Appellate Procedure 66-1, the Plaintiff-Appellee seeks an extension of time of twelve (12) days within which to file her opposition brief in the above-captioned matter. The brief is presently due on November 8, 2019. The new filing deadline sought is November 20, 2019. This is the fourth extension of this deadline sought. The grounds for this Motion are set forth in the “Specific Facts Relied Upon” in Part II below.

Counsel for the Defendant-Appellant consents to the granting of this Motion.

I. BRIEF HISTORY OF THE CASE

Plaintiff Judith Kissel brought this medical negligence and products liability action against Defendants Reed Wang, Center for Women’s Health P.C., and Health Body World Supply Inc. on April 10, 2012. The case was tried before the Honorable Kenneth Povodator and a verdict entered for the Plaintiff on all claims. The Defendants filed post-judgment motions, and the trial court denied these motions on January 3, 2019. Defendant Wang appealed the judgment against him on January 10, 2019. Defendant-Appellant’s opening brief was filed on July 19, 2019.

II. SPECIFIC FACTS RELIED UPON

Counsel has made some progress and has a near-final draft of the brief. Since defendants filed three separate briefs, it is taking additional time for plaintiff to respond to all three simultaneously, and is attempting to do so in the way that will be easiest for the Court to manage. In addition, constructing a plaintiff's Appendix that responds to all three briefs filed by defendants is taking time.

III. LEGAL GROUNDS UPON WHICH MOTION RELIES

This Motion is filed pursuant to Rule of Appellate Procedure 66-1.

IV. STATUS OF BRIEF

Undersigned counsel has drafted the brief and is revising and preparing the Appendix.

V. POSITION OF OPPOSING COUNSEL

Counsel for Defendant-Appellant consents to the granting of this Motion.

THE PLAINTIFF-APPELLEE,

By /s/ Alinor C. Sterling
ALINOR C. STERLING
MATTHEW S. BLUMENTHAL
KOSKOFF KOSKOFF & BIEDER
350 FAIRFIELD AVENUE
BRIDGEPORT, CT 06604
TELEPHONE: (203) 336-4421
JURIS #32250
asterling@koskoff.com
mblumenthal@koskoff.com

CERTIFICATE OF COMPLIANCE AND SERVICE

Pursuant to Rule of Appellate Procedure 62-7, I hereby certify that on November 1, 2019, a true and correct copy of the foregoing has been delivered electronically to the last known e-mail addresses of each counsel of record for whom an e-mail has been provided, as indicated below; that the foregoing document has been redacted or does not contain any names or other personal identifying information that is prohibited from disclosure by rule, statute, court order or case law; and that the foregoing document complies with all applicable rules of appellate procedure.

Attorney Wesley W. Horton
Attorney Kenneth J. Bartschi
HORTON, DOWD, BARTSCHI & LEVESQUE, P.C.
90 Gillett Street
Hartford CT 06105
wes@hdblfirm.com
kbartschi@hdblfirm.com

Attorney Mary Alice Moore Leonhardt
MOORE LEONHARDT & ASSOCIATES, LLC
67 Russ Street
Hartford CT 06106
860-216-6337
ma@mooreleonhardt.com

Attorney David J. Robertson
Attorney Keith Blumenstock
HEIDELL, PITTONI, MURPHY & BACH, LLP
855 Main Street, Suite 1100
Bridgeport CT 06604
203-382-9700
drobotson@hpmb.com
kblumenstock@hpmb.com

Attorney Laura Pascale Zaino
Attorney Paul D. Meade
Attorney Jonathan Kelly
HALLORAN & SAGE, LLP
One Goodwin Square 225 Asylum Street
Hartford CT 06103
860-522-6103
zaino@halloransage.com
meade@halloransage.com
kelly@halloransage.com

/s/ Alinor C. Sterling
ALINOR C. STERLING